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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

JANE DOE 1, individually and on
behalf of all others similarly situated,
Plaintiff,

v.

MATTHEW WEISS, CALIFORNIA
STATE UNIVERSITY, SAN
BERNADINO, BOARD OF
TRUSTEES OF THE CALIFORNIA
STATE UNIVERSITY, and KEFFER
DEVELOPMENT SERVICES, LLC,
Defendants.

Case No.: 5:25-cv-00997-HDV-MBK

NOTICE OF INTERESTED PARTIES AND RELATED CASE

By Order dated May 23, 2025, Judge Mark A. Goldsmith of the Eastern District
of Michigan consolidated eight cases pending before him.¹ A copy of the Order is

¹ Case numbers are:

1. 25-10806, *Doe 1 et al v. Weiss et al.*

1 attached as **Ex. A**. Each case is based on allegations that a former University of
2 Michigan football coach, Matthew Weiss, exploited vulnerabilities in student-athlete
3 data systems utilized by Keffer Development Services, LLC. In addition to the eight
4 Eastern District of Michigan cases, five other similar cases have been filed in different
5 districts based on those same allegations, including this case.²

7 In Judge Goldsmith's May 23, 2025 Order, he also resolved competing
8 leadership motions. He appointed as interim co-lead counsel: Parker G. Stinar of
9 Stinar, Gould, Grieco, & Hensley, P.L.L.C.; James Pizzirusso of Hausfeld LLP; and
10 J. Gerard Stranch, IV of Stranch, Jennings & Garvey, PLLC. Nathan Fink of Fink
11 Bressack was appointed interim liaison counsel (the leadership group in the Eastern
12 District of Michigan is referred to as the "Leadership Group"). The court declined to
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16 2. 25-10855, *Doe I et al v. Weiss et al.*

17 3. 25-10870, *Roe CLF 001 v. Weiss et al.*

18 4. 25-10876, *Doe v. University of Michigan Board of Regents et al.*

19 5. 25-10951, *Doe v. Board of Regents of the University of Michigan et al.*

20 6. 25-10946, *Doe I et al v. The Regents of The University of Michigan et al.*

7. 25-10988, *Doe v. Weiss et al.*

8. 25-10999, *Doe v. Board of Regents of the University of Michigan et al.*

21 ² Those are:

22 1. Northern District of Illinois: *Doe v. Weiss et al*, 25-04233;

23 2. Northern District of Ohio: *Doe v. Weiss et al*, 25-00827;

24 3. Central District of California: *Doe v. Weiss et al*, 25-00997;

4. Middle District of North Carolina: *Doe v. Weiss et al*, 25-00303;

5. District Court of Massachusetts: *Doe v. Weiss et al*, 25-11151.

1 appoint a different group of plaintiffs' counsel who filed this case (the "Non-
2 leadership Group") to leadership.³

3
4 The Leadership Group has come to learn that the Non-leadership Group has
5 sought leadership in each case not consolidated with Judge Goldsmith, despite the
6 complete overlap in class definitions. The class definition in the first filed case that
7 was filed by the Leadership Group in the Eastern District of Michigan is: All persons
8 whose personal information, images, data, social media, or videos were access by
9 Weiss without authorization. See, ECF No. 1, PageID.21 at ¶ 110 in Case No. 25-
10 10806, *Doe I et al v. Weiss et al.*, United States District Court for the Eastern District
11 of Michigan. That definition has been reused in every case subsequently filed, both
12 those filed within Michigan and those outside of Michigan, including in this one.

13
14 The only court outside of Michigan to rule on the leadership requests appears
15 to be Chief Judge Sara Lioi in the Northern District of Ohio, by Order dated May 30,
16 2025. A copy of the Order is attached as **Ex. B**. Chief Judge Lioi denied the request to
17 appoint leadership in a manner differently than appointed in the Eastern District of
18 Michigan. See Northern District of Ohio, Case No. 25-00827, *Doe v. Weiss et al.* at
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21 ³ In the Eastern District of Michigan, the court also scheduled a status conference to
22 discuss the composition of the executive committee for June 12, 2025 at noon. The
23 Leadership Group has extended an opportunity to the Non-leadership Group to
24 participate in the executive committee in the lead case in the Eastern District of
Michigan.

1 Doc # 18. The court first observed that the request was premature because there is only
2 one case in that court based on the “Weiss” or “Keffer” allegations. *Id.* at PageID #
3 402. The court also noted leadership motions are reserved for situations where there
4 is leadership competition in a single court, but that there is no competition in that court
5 because there is only one group of plaintiff counsel who have filed in that court. *Id.* at
6 PageID # 403. Finally, the court noted that the Non-leadership Group appears
7 inappropriately to be seeking to circumvent the leadership determination of the
8 Eastern District of Michigan. *Id.* at PageID # 404. The court stated:

11 Such a conclusion is bolstered by the fact that Doe invited this Court to
12 rule on the pending motion before the date of the initial conference in
13 the Michigan cases, where the court and counsel were expected to
14 discuss issues including consolidation and the appointment of interim
15 counsel. (*See* Doc. No. 7, at 23 (noting that “[a]lthough this case is in
16 its infancy . . . , it is part of a larger set of cases. The May 14th case
17 management conference in the Michigan cases is a good example of the
18 activities that are likely to take place in the various cases now on file,
19 and a good basis to make an early interim class counsel appointment in
20 this case”).). **This Court does not wish to be a party to what appears
21 to be a jockeying for position**, particularly when there are multiple
22 older consolidated cases pending in another district.

18 *Id.* (Emphasis added).

19 For the same reasons identified by Chief Judge Lioi in her May 30, 2025 Order,
20 the request for leadership in this case is premature and unnecessary. There is only one
21 case and one group of counsel in this court. There is no leadership competition
22 requiring a leadership decision. The second sentence of Rule 23(g)(2) simply has no
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1 application unless there is more than one applicant, and there is not more than one
2 applicant here. The putative class definitions are also identical and therefore subsumed
3 by the first filed case in Michigan. As Chief Judge Lioi found, this court may not wish
4 to participate in any such “jockeying for position.”
5

6
7 Date: June 10, 2025

Respectfully Submitted,

8 By: /s/ Parker Stinar

9 Parker Stinar

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 10, 2025 the foregoing document was filed via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record.

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